

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC

In the matter of:	)	
	)	
Creation of a Low Power Radio Service	)	MM Docket-99-25
	)	
Amendment of Service and Eligibility Rules	)	MB Docket 07-172
for FM Broadcast Translator Stations	)	RM-11338
	)	

**REPLY COMMENTS OF RIVERTON RADIO PROJECT**

Riverton Radio Project (“RRP”) is a non-profit entity in formation to obtain an LPFM license to provide education, information and entertainment to the rural areas of western Wicomico County, Maryland including Riverton, Mardela Springs and Sharptown. Principals include long time Riverton resident Eva Bradley and REC Networks founder Michelle A. Eyre. A radio station specific to this region would be beneficial due to the area’s vulnerability to thunderstorms as well as the area’s close proximity to the Nanticoke River.

RRP supports the changes to the Commission’s “Option 3” approach to the handling of Auction 83 translator applications that was proposed by Prometheus Radio Project, REC Networks and Common Frequency (“LPFM Advocates”).

Wicomico County is in the Salisbury-Ocean City, MD market which has been identified as a “process” market under both the original “Option 3” proposal by the Commission as well as the modified version proposed by the LPFM Advocates. While we accept the fact that translators will not be dismissed in our market, we hope that the Commission does extend the second adjacent channel waiver process to include original construction permits. Bringing a community education and information service at locations on the fringe of metro market stations such as our position in Riverton would not be possible without these additional options at the time of application.

We also ask the Commission to consider the comments of REC, Prometheus and Common Frequency in regards to the abuse of translators carrying the multicast (HD) streams of full power stations. Another LPFM station on Maryland’s eastern shore, WRYR-LP, Sherwood, MD

is currently being victimized by a translator located across the Chesapeake Bay in Baltimore. These translators are operating under the guise of a “fill-in” translator but they are not truly a “fill-in” station as they are adding a new channel to the market. As a result, the station is permitted to operate at near-class A field strength but yet is not counted as a station in the market for ownership purposes. We consider this a flagrant abuse of the FM translator service and a complete ethical violation of the Commission’s localism goals.

RRP is looking forward to filing in the next LPFM filing window to create a new community resource for the residents of Riverton, Sharptown and Mardela Springs.

We look forward to the outcome of the Commission’s actions.

Respectfully Submitted,

/s/

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September 27, 2011

/s/

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